

Alan L. Sullivan (3152)
Paul W. Shakespear (14113)
Snell & Wilmer LLP
15 W. South Temple, Ste. 1200
Gateway Tower West
Salt Lake City, Utah 84101
Telephone: (801) 257-1900
Email: asullivan@swlaw.com
pwshakespear@swlaw.com

Steven M. Gombos (Admitted pro hac vice)
Gerald M. Ritzert (Admitted pro hac vice)
GOMBOS LEYTON, P.C.
11350 Random Hills Road, Suite 400
Fairfax, VA 22030
Telephone: (703) 934-2660
Email: sgombos@glpclaw.com
gritzert@glpclaw.com

Attorneys for Plaintiff Center for Excellence in Higher Education

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

CENTER FOR EXCELLENCE IN
HIGHER EDUCATION,

Plaintiff,

vs.

BETSY DeVOS, *et al.*,
Defendants.

JOINT STATUS REPORT

Case No. 2:16-cv-00911-CW

Judge Clark Waddoups

Magistrate Judge Dustin B. Pead

Pursuant to the parties' December 4, 2018 status report (ECF 85), the parties submit this joint status report advising the Court of the status of the parties' efforts to resolve the current litigation.

1. On January 19, 2018, the Center for Excellence in Higher Education (CEHE) and the Department of Education filed a stipulated joint motion to stay proceedings to allow the parties to continue discussions related to a resolution of this

action. (ECF 73). The Court granted the parties' motion that same day and ordered the parties to file a status report by April 20, 2018. (ECF 75).

2. On December 4, 2018, the parties filed a joint status report informing the Court that they had reached an agreement on a means of resolving this matter without further litigation. The parties asked the Court to continue the stay until December 14, 2018, at which time the parties anticipated filing a joint stipulation to dismiss the case. (ECF 85).

3. Additional time is necessary to allow the Department of Education to complete processing of the agreement.

4. Accordingly, the parties jointly request that the Court continue the stay for an additional week, until December 21, 2018, at which time the parties anticipate filing a joint stipulation to dismiss the case.

Dated this December 14, 2018:

Respectfully submitted,

GOMBOS LEYTON, P.C.

/s/ Steven M. Gombos

Counsel for Plaintiff Center for Excellence
in Higher Education, Inc.

United States Department of Justice

/s/ Daniel Halainen

Daniel Halainen
Trial Attorney
U.S. Department of Justice

Civil Division, Federal Programs Branch
20 Massachusetts Ave., N.W.
Washington, D.C. 20530
Telephone: (202) 616-8101
Facsimile: (202) 616-8470
E-mail: daniel.j.halainen@usdoj.gov

Counsel for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 14, 2018, I have or will have caused the foregoing document to be filed electronically through the CM/ECF system, which I understand will cause the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

Daniel J. Halainen
20 Massachusetts Avenue, N.W.
Washington, D.C. 20530
Telephone: (202) 616-8101
Facsimile: (202) 616-8470
Daniel.J.Halainen@usdoj.gov

Jared C. Bennet
185 South State Street, #300
Salt Lake City, Utah 84111
Telephone: (801) 524-5682
Jared.bennett@usdoj.gov

Counsel for Defendants

GOMBOS LEYTON, P.C.

/s/ Steven M. Gombos
Counsel for Plaintiff Center for
Excellence in Higher Education, Inc.